

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

In the Matter of)

ISRAEL DISCOUNT BANK OF NEW YORK)
NEW YORK, NEW YORK)

(INSURED STATE NONMEMBER BANK))
_____)

ORDER TO PAY

FDIC-06-099k

Israel Discount Bank of New York, New York, New York ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated October 23, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying the pattern of violations of law or regulation and/or reckless engagement in unsafe or unsound banking practices for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the United States Department of the Treasury.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

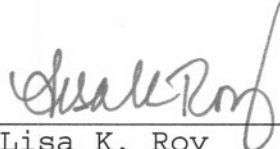
ORDER TO PAY

IT IS HEREBY ORDERED, that by reason of the pattern of violations of law or regulation and/or reckless engagement in unsafe or unsound practices set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty in the amount of \$12 million be, and hereby is, assessed against Israel Discount Bank of New York, New York, New York. The assessment shall be concurrent with the assessment of a civil money penalty in the amount of \$12 million by the Financial Crimes Enforcement Network, United States Department of the Treasury ("FinCEN"), and the New York State Banking Department and shall be satisfied by one payment in the amount of \$6 million to the United States Department of the Treasury on behalf of the FDIC and FinCEN and one payment in the amount of \$6 million to the New York State Banking Department.

This Order to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 31st day of October, 2006.



Lisa K. Roy
Associate Director
Division of Supervision and
Consumer Protection